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Attorneys for Defendant
**AMERICAN HOME SHIELD
CORPORATION**

Attorneys for Defendant
**AMERICAN HOME SHIELD
CORPORATION**

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ERIN ROBERTSON, on behalf of herself and
other similarly situated,

Plaintiff,

v.

AMERICAN HOME SHIELD
CORPORATION, a Delaware corporation.

Defendant.

CASE NO. 2:24-cv-01571-RFB-EJY

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANT TO
RESPOND TO THE COMPLAINT –
CLASS ACTION**

(SECOND REQUEST)

IT IS HEREBY STIPULATED AND AGREED by and between counsel for Plaintiff Erin Robertson, on behalf of herself and other similarly situated, and Defendant American Home Shield Corporation, and pending the Court's approval, that Defendant shall have additional thirty (30) days to answer or otherwise respond to the Complaint (ECF No. 1) filed in this matter. Defendant's current response deadline is October 21, 2024. With the requested thirty (30) day extension, Defendant's deadline to answer or otherwise respond to the Complaint is extended to November 20, 2024.

Good cause exists for the extension set forth herein. The parties and their counsel have been and are continuing to informally exchange information. Recently, the parties discovered new

1 facts that impact the basis of the claims and defenses in this case and are analyzing the issues
2 presented by this new information. The parties request an additional thirty (30) days to assess
3 these new facts and discuss their respective positions. This request is made in good faith and is
4 not intended for purposes of delay.

5 Respectfully submitted,

6 Dated: October 17, 2024

7 DICKINSON WRIGHT PLLC

8 /s/ Michael N. Feder

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19 *CORPORATION*

Dated: October 17, 2024

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9 /s/ Aleksandr "Sasha" Litvinov

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IT IS SO ORDERED:

24 
25 UNITED STATES MAGISTRATE JUDGE
26

Dated: October 17, 2024

CASE NO.: 2:24-cv-01571-RFB-EJY